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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

THE ESTATE OF STEPHEN ROMNEY
SWENSEN, and CREW CAPITAL
GROUP, LLC, a Nevada limited liability
company,

Defendants,

WENDY SWENSEN, an individual,
SARIA C. RODRIGUEZ, an individual,
WS FAMILY IP, LLC, a Utah limited
liability company, WINGMAN, LLC, a
Utah limited liability company, and
SWENSEN CAPITAL, LLC, a Utah limited
liability company,

Relief Defendants.

**RECEIVER CHAD PEHRSONS' MOTION
REQUESTING COURT ORDER
DIRECTING GODADDY.COM TO GRANT
RECEIVER SECURE ACCESS TO
WINGMAN.COM**

Case No.: 1:22-cv-00135-RJS-DBP

Judge: Hon. Robert J. Shelby

Magistrate Judge: Dustin B. Pead

Chad S. Pehrson, the Court-Appointed Receiver (the “**Receiver**”) of the Estate of Stephen Romney Swensen; Crew Capital Group, LLC; Wingman LLC; WS Family IP, LLC; and Swensen Capital, LLC (collectively, the “**Receivership Defendants**”), hereby requests that the Court issue an order granting the requested relief. A proposed order will be submitted herewith.

In an effort to identify assets of the Receivership Defendants and distribute proceeds of to investors, the Receiver respectfully requests that the Court enter an Order requiring GoDaddy.com to grant the Receiver secure access to wingman.com. An order from this Court is required by GoDaddy.com to complete the contemplated based on the following facts:

1. The Receiver identified wingman.com as a domain owned by Stephen Swensen (“**Mr. Swensen**”). *See* Declaration of Chad Pehrson, attached as Exhibit A at ¶ 3.
2. The Receiver identified Mr. Swensen’s email tied to wingman.com (the “**Domain**”) as heyswensen@gmail.com. *Id.* at ¶ 4.
3. Mr. Swensen chose to keep ownership of the Domain private by using Domains By Proxy, LLC. *Id.* at ¶ 5.
4. Inquiries for the Domain could be sent to wingman.com@domainsbyproxy.com which were then forwarded to sswensen@gmail.com. *Id.* at ¶ 6.
5. Neither email account associated with the Domain has been accessible to the Receiver. *Id.* at ¶ 7.
6. On or around November 12, 2020, Ronald Gibb (“**Mr. Gibb**”) transferred the Domain into his own personal GoDaddy account. *Id.* at ¶ 8.
7. Mr. Gibb has informed the Receiver that he is not the owner of the Domain. *Id.* at ¶ 9.

8. There exists confusion regarding the current owner of the Domain as it is currently in Mr. Gibb's personal GoDaddy account but lists Mr. Swensen as the contact. *Id.* at ¶ 10.

9. The Receiver reached out to GoDaddy representatives about the owner of the Domain and how to access the Domain. *Id.* at ¶ 11.

10. GoDaddy responded that a court order was required to comply with the Receiver's request. *Id.* at ¶ 12.

11. Specifically, GoDaddy requested an order that "(1) specifically identifies the domain registration(s) at issue, and (2) specifically directs GoDaddy to take specific action with regard to the [D]omain[.]" *Id.* at ¶ 13.

The Certified Order Appointing Receiver vests broad authority in the Receiver, including without limitation, power to "transfer, compromise, or otherwise dispose of any Receivership Property, other than real estate[.]" and the express instruction to "investigate, prosecute, defend, intervene in or otherwise participate in ... [a] proceeding of any kind ... to recover and/or conserve Receivership Property." *See* Dkt. 38. Indeed a "district court has broad powers and wide discretion to determine the appropriate relief in an equity receivership." *See e.g., S.E.C. v. Mgt. Sols., Inc.*, No. 2:11-CV-01165-BSJ, 2013 WL 594738, at *1–2 (D. Utah Feb. 15, 2013). This situation requires the Court to issue an order identifying the domain registration at issue and directing GoDaddy to take specific action regarding the Domain.

For the foregoing reasons, the Receiver accordingly requests the Court enter the proposed order filed concurrently herewith requiring GoDaddy.com to grant the Receiver full and secure access to, and control of, wingman.com.

DATED: December 2, 2024

KUNZLER BEAN & ADAMSON, PC

/s/Taylor J. Hadfield

Taylor J. Hadfield

R. Jeremy Adamson

Attorneys for Receiver

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2024, I caused a true and correct copy of the foregoing document to be served via CM/ECF on all counsel of record in this litigation.

/s/Taylor J. Hadfield